

Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

RALPH W. CLOSE and LAURA A. LARSON,  
individually as parents of the decedent JAMES  
ROBERT CLOSE,

Plaintiffs,

v.

PIERCE COUNTY, WASHINGTON; PIERCE  
COUNTY SHERIFF PAUL PASTOR; STEVE  
PARR; EDWARD CORRELL; JOSEPH  
GORMAN; and TODD KLEMME,

Defendants.

No. CV-09-5023 RJB

REQUEST FOR ENTRY OF JUDGMENT

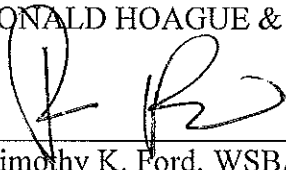
Pursuant to FRCP 68(a), plaintiffs Ralph Close and Laura Larson hereby request that the Clerk enter judgment in favor of plaintiffs Ralph Close and Laura Larson against defendant Pierce County, Washington, in the amount of \$100,000.00, inclusive of costs and fees, pursuant to the attached FRCP 68 Offer of Judgment and Acceptance. As indicated therein, this judgment should be entered against defendant Pierce County, only. A proposed form of Judgment is attached.

DATED this 6 day of August, 2009.

Respectfully submitted,

MacDONALD HOAGUE & BAYLESS

By

  
Timothy K. Ford, WSBA #5986  
David J. Whedbee, WSBA #35977  
Attorneys for Plaintiffs

REQUEST FOR ENTRY OF JUDGMENT - 1

No. CV-09-5023 RJB

9178.1 ch063203

MACDONALD HOAGUE & BAYLESS  
705 Second Avenue, Suite 1500  
Seattle, Washington 98104  
Tel 206.622.1604 Fax 206.343.3961

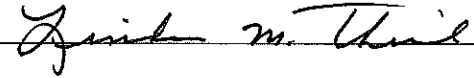
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6<sup>th</sup> day of August, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

Jerry J Moberg, [jjmoberg@canfield-associates.com](mailto:jjmoberg@canfield-associates.com), [dawnseverin@canfield-associates.com](mailto:dawnseverin@canfield-associates.com), [jerrymoberg@canfield-associates.com](mailto:jerrymoberg@canfield-associates.com), [shareenlaughlin@canfield-associates.com](mailto:shareenlaughlin@canfield-associates.com)

Ronald LaMar Williams, [rwillia@co.pierce.wa.us](mailto:rwillia@co.pierce.wa.us), [pcpatvecf@co.pierce.wa.us](mailto:pcpatvecf@co.pierce.wa.us)

Gerald A. Horne, [ghorne@co.pierce.wa.us](mailto:ghorne@co.pierce.wa.us)



Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

RALPH W. CLOSE and LAURA A. LARSON,  
individually as parents of the decedent JAMES  
ROBERT CLOSE,

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v.

PIERCE COUNTY, WASHINGTON; PIERCE  
COUNTY SHERIFF PAUL PASTOR; STEVE  
PARR; EDWARD CORRELL; JOSEPH  
GORMAN; and TODD KLEMME,

Defendants.

No. CV-09-5023 RJB

NOTICE OF ACCEPTANCE OF OFFER OF  
JUDGMENT BY DEFENDANT PIERCE  
COUNTY

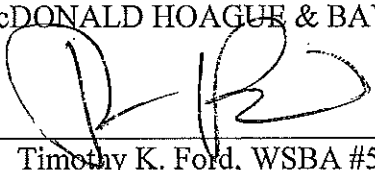
Plaintiffs Ralph Close and Laura Larson hereby accept the attached Offer of Judgment of  
defendant Pierce County to have judgment entered against it in the amount of \$100,000.00,  
including attorneys' fees and costs.

DATED this 6 day of August, 2009.

Respectfully submitted,

MacDONALD HOAGUE & BAYLESS

By

  
Timothy K. Ford, WSBA #5986

David J. Whedbee, WSBA #35977

Attorneys for Plaintiffs

NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT BY  
DEFENDANT PIERCE COUNTY - 1

No. CV-09-5023 RJB

9178.1 ch063201

MACDONALD HOAGUE & BAYLESS  
705 Second Avenue, Suite 1500  
Seattle, Washington 98104  
Tel 206.622.1604 Fax 206.343.3961

RECEIVED  
AUG 3 2009

Honorable Robert J. Bryan  
U.S. District Judge

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

RALPH W. CLOSE and LAURA A.  
LARSON, individually as parents of the  
decedent JAMES ROBERT CLOSE,

Plaintiffs,

NO. C09-5023 RJB

vs.

PIERCE COUNTY, WASHINGTON;  
PIERCE COUNTY SHERIFF PAUL  
PASTOR; STEVE PARR; EDWARD  
CORRELL; JOSEPH GORMAN; and TODD  
KLEMME,

OFFER OF JUDGMENT

Defendants.

Pursuant to FRCP 68 and *Marek v. Chesny*, 473 U.S. 1 (1985), Defendant Pierce  
County hereby offers to permit Plaintiffs, Ralph W. Close and Laura A. Larson, to take a  
judgment against it in this action in the amount, including attorney's fees and costs, of One

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OFFER OF JUDGMENT - 1  
Close OJ.doc  
USDC WAWD No C09-5023 RJB

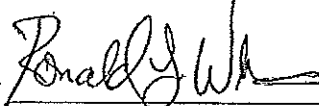
Pierce County Prosecuting Attorney/Civil Division  
955 Tacoma Avenue South, Suite 301  
Tacoma, Washington 98402-2160  
Main Office: (253) 798-6732  
Fax: (253) 798-6713

ORIGINAL

1 Hundred Thousand Dollars (\$100,000). This is a settlement offer made in a case of disputed  
2 liability and is not an admission of any fault.

3 DATED this 31<sup>st</sup> day of July, 2009.

4  
5 GERALD A. HORNE  
Prosecuting Attorney

6 By   
7 RONALD L. WILLIAMS / WSB# 13927  
8 Deputy Prosecuting Attorney  
9 Attorneys for Pierce County  
PH: 253-798-3612 / FAX: 253-798-6713

10  
11 CERTIFICATE OF SERVICE

12 I hereby certify that a true copy of the foregoing OFFER OF JUDGMENT was  
13 delivered this 31<sup>st</sup> day of July, 2009, to ABC-Legal Messengers, Inc., with  
appropriate instruction to forward the same to counsel for Plaintiffs as follows:

14 Timothy K. Ford  
15 David Whedbee  
16 MacDONALD HOAGUE & BAYLESS  
705 Second Avenue, Suite 1500  
17 Seattle, WA 98104

18   
19 CHRISTINA M. SMITH

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6<sup>th</sup> day of August, 2009, pursuant to FRCP 5(b)(2)(E) and 68 and WDLR 5(b), I electronically served the foregoing on the following:

Jerry J Moberg, jerrymoberg@canfield-associates.com

Ronald LaMar Williams, rwillia@co.pierce.wa.us

Jurida M. Thiel

NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT BY  
DEFENDANT PIERCE COUNTY - 2

No. CV-09-5023 RJB  
9178.1 ch063201

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